

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA
EASTERN DIVISION**

<p>TOM HINKLEY,</p> <p>Plaintiff,</p> <p>vs.</p> <p>LINCOLN NATIONAL LIFE INSURANCE COMPANY,</p> <p>Defendant.</p>	<p>CIVIL ACTION NO. 3:19-cv-00269-ARS</p> <p>JOINT MOTION REGARDING DEADLINE TO RESPOND TO PLAINTIFF’S COMPLAINT</p>
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COMES NOW Plaintiff Tom Hinkley (“Hinkley”) and Defendant¹ Lincoln National Life Insurance Company (“Lincoln”) (collectively, the “Parties”), file this Joint Motion Regarding Deadline to Respond to Plaintiff’s Complaint.

1. Plaintiff filed this lawsuit on December 6, 2019. Pursuant to the Court’s order entered on January 3, 2020 (Document 6), Lincoln must file its Answer or otherwise respond by January 3, 2020.

2. The Parties are continuing to discuss a resolution of the case and want to save both the Court’s resources and the Parties’ time and expense of filing briefs if the case will be resolved through settlement. Accordingly, the Parties respectfully request that the Court enter an order that Lincoln have until and including March 4, 2020, to answer or otherwise respond to Plaintiff’s Complaint.

3. This Joint Motion Regarding Deadline to Respond to Plaintiff’s Complaint is not filed for purpose of delay, but only so that justice may be done.

¹ The correct name of the Defendant in this action is Lincoln Life Assurance Company of Boston (formerly known as Liberty Life Assurance Company of Boston).

WHEREFORE, the Parties request that the Court enter an order that Lincoln shall have until and including March 4, 2020, to answer or otherwise respond to Plaintiff's Complaint.

Dated this 3rd day of February 2020.

Respectfully submitted,

SCHNEIDER, SCHNEIDER & SCHNEIDER

/s/ Mac Schneider (with permission)
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- AND -

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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing pleading was electronically filed with the clerk for the U.S. District Court, District of North Dakota, using the electronic case filing system of the court, and the electronic case filing system sent a “Notice of Electronic Filing” to the following attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means, as follows:

Mac Schneider
Email: mac@schneiderlawfirm.com

February 3, 2020
Date

/s/ Iwana Rademaekers
Iwana Rademaekers